

Ari B. Teman

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The Honorable Judge Paul Engelmayer  
Southern District of New York  
40 Foley Square  
New York, NY 10007

January 28, 2022

**Re: Letter Motion to allow for travel to Melbourne Comedy Festival**

Your Honor,

The Defendant writes seeking permission to travel to perform at the prestigious Melbourne Comedy Festival, which runs from 30 Mar – 24 Apr 2022.

There is no risk that the Defendant will not return to the United States long before he would be required to surrender to serve any sentence:

Australia has extradition to the United States, and does not grant citizenship rapidly (such as Israel might). Therefore there is no risk of the Defendant remaining in Australia beyond the time allowed by Your Honor for this performance. Australia is also heavily-policed during this time, as has been reported in the news.

The Defendant has no family members living in Australia. The Defendant has many reasons to return to the United States, including his beloved puppy, property, businesses, friends, family, and the fact that 10 months (with good behavior) in a prison camp is not a great reason to become a lifelong fugitive.

The Government concedes that the Defendant is not a flight risk and not a threat to the community.

During this time the Defendant will remain in therapy via video chat and phone (as currently is the case), as per the court order and continue his pretrial supervision requirements.

Defendant will inform pretrial supervision of any location where he will stay, and be available via phone and video chat.

Australia is nearly 95% vaccinated, which makes it a relatively safe place for the Defendant to travel, and Defendant is also vaccinated and has recovered from COVID-19 which is also said to offer some protection.

Because Your Honor concedes there are issue(s) which warrant bond-pending Appeal, and because Your Honor and the Government agrees that it is wise for the Defendant to earn a living to pay back any alleged debt (and not incur further debt), Defendant respectfully requests that Your Honor approve the Defendant be allowed to travel to perform at the festival, and allow for time for the Defendant to go through Australia's often-strict quarantine requirements, such that the defendant may travel to Melbourne three weeks before the Festival (to allow for 2 weeks of quarantine and 1 week of technical preparation and rehearsal, which will also give the Defendant time to recover from jet lag), and two weeks after the Festival (again, to allow for 2 weeks of quarantine as may be required by Australia).

Respectfully submitted,



Ari Teman,  
Defendant, pro se

The Court directs the Government to submit a letter response by Friday, February 4, 2022, which sets out its views on Mr. Teman's application and the views of Pretrial Services (and, if participating in Mr. Teman's supervision during his release on bail pending appeal, the Probation Department).

1/28/2022

SO ORDERED.



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PAUL A. ENGELMAYER  
United States District Judge